



# ASPIRING MINDS TUITION

EDUCATION WELLBEING CREATIVE

## CONFLICT OF INTEREST POLICY

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## Conflicts of Interest Policy

### Contents

1. Purpose .....	3
2. Scope.....	3
3. Legal and Regulatory Guidance.....	3
4. Definition of a Conflict of Interest.....	3
5. Prevention of Conflict of Interest .....	4
6. Exam-Specific Measures .....	4
7. Managing Conflicts in Partnership with BCS.....	4
8. Declaration and Recording.....	4
9. Linked Policies .....	5
10. Monitoring and Review.....	5

## 1. Purpose

This policy outlines how AMT identifies, manages and mitigates conflicts of interest within its educational, assessment and examination activities. It ensures the integrity, transparency and fairness of all services delivered, particularly in partnership with awarding bodies such as BCS (The Chartered Institute for IT).

## 2. Scope

This policy applies to all AMT personnel including directors, tutors, support staff and external contractors involved in teaching, mentoring, exam delivery, invigilation, or assessment. It specifically covers:

- Tuition and academic support
- Exam administration and invigilation
- BCS assessments and qualifications
- Interactions with learners, parents/carers and partner organisations

## 3. Legal and Regulatory Guidance

- **BCS Approved Centre Agreement & Conflict of Interest Policy**  
Governs the conduct of BCS-approved training providers to ensure transparency and fairness.  
<https://www.bcs.org/>
- **General Data Protection Regulation (GDPR)**  
Mandates lawful handling of personal and sensitive information, including conflict declarations.  
<https://www.gov.uk/data-protection>
- **Equality Act 2010**  
Requires organisations to ensure no unfair disadvantage based on personal characteristics or background.  
<https://www.legislation.gov.uk/ukpga/2010/15/contents>

## 4. Definition of a Conflict of Interest

A conflict of interest occurs when an individual's personal, professional, or financial interests compromise, or appear to compromise, their ability to act impartially and in the best interests of learners, AMT, or our partners such as BCS. Examples include:

- A tutor acting as an invigilator for their own learner's exam
- A staff member having a close personal or financial relationship with a learner or their family
- Undisclosed external roles that may influence decisions or assessments
- Favouritism, bias, or unequal treatment in academic or examination settings

## 5. Prevention of Conflict of Interest

AMT is proactive in preventing conflicts of interest by:

- Ensuring tutors do not invigilate exams for learners they teach or support
- Assigning dedicated invigilators not involved in tuition or academic guidance
- Requiring all staff to declare potential or actual conflicts before any teaching or exam activity
- Maintaining transparent records of all declarations and decisions
- Embedding a culture of openness, ethics and professional conduct in all aspects of our work

## 6. Exam-Specific Measures

To protect the fairness and credibility of assessment processes:

- AMT will assign independent invigilators wherever possible, ensuring they are not involved in any teaching or academic support roles.
- Where suitable, AMT may allocate the same invigilator to a specific learner to provide continuity and a familiar presence, provided there is no teaching relationship.
- A clear separation between teaching and assessment roles will be maintained at all times.

## 7. Managing Conflicts in Partnership with BCS

AMT operates in strict accordance with the BCS Conflict of Interest Policy, which governs the integrity of exam delivery, invigilation and assessment. As a trusted BCS-accredited centre, we are committed to upholding these standards to ensure fairness and transparency.

To meet these obligations:

- Tutors or staff who have taught or provided direct support to a learner must not invigilate that learner's exams.
- AMT typically assigns dedicated invigilators who are not involved in tuition, supporting both impartiality and learner comfort.
- All staff must disclose any potential or actual conflicts to AMT management and follow BCS guidance on confidentiality, impartiality and exam ethics.
- AMT ensures full compliance with BCS policies on exam security, data protection and malpractice prevention and will report and investigate any suspected breaches in collaboration with BCS.
- Staff involved in the delivery of BCS exams receive appropriate training on conflict of interest protocols and expectations.

## 8. Declaration and Recording

All AMT staff are required to:

- Complete a Conflict of Interest Declaration Form annually and whenever their situation changes

- Declare any potential conflicts before teaching, mentoring, assessing or invigilating
- Cooperate fully with any internal reviews or investigations
- Update AMT management immediately if a new conflict arises

AMT maintains a central register of all declared conflicts and actions taken, which is reviewed regularly by the Director.

## 9. Linked Policies

This Conflict of Interest Policy should be read alongside the following AMT policies, which collectively support ethical, fair and transparent practice:

- **BCS Conflict of Interest Policy**  
For the official guidance on exam-related conflicts within BCS-accredited centres
- **Safeguarding Policy**  
To protect the welfare and rights of all learners, particularly in assessment contexts
- **Reasonable Adjustments Policy**  
Outlining how we support learners with individual needs fairly
- **BCS Exam Invigilation Guidelines**  
Detailing roles, responsibilities and impartiality of invigilators
- **Malpractice and Maladministration Policy**  
For procedures relating to suspected misconduct or breach of regulations
- **Equality, Diversity and Inclusion Policy**  
Promoting fair treatment and equal opportunity in all learning and assessment activities
- **GDPR and Data Protection Policy**  
Ensuring confidentiality, appropriate data handling and learner privacy
- **Health and Safety Policy**  
Maintaining safe environments for tuition and assessment
- **Staff agreement: Code of Conduct**  
Setting out expected standards of behaviour and professionalism
- **Learner Agreement: Code of Conduct**  
Outlining mutual respect, behaviour expectations and academic integrity

## 10. Monitoring and Review

This policy is reviewed annually or when there are changes to:

- Relevant legislation or regulatory guidance (e.g. from BCS or Ofqual)
- AMT's operational procedures or exam partnerships
- Reported incidents or internal audits

Policy reviews are led by the Director, with input from staff and stakeholders where appropriate.

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